

IN THE UNITED STATES COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

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JUL 27 2011
7-27-11
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

GERMAINE J GRANT
Plaintiff.

-v-

CLIENT SERVICES INC
Defendant.

1:11-cv-05070
Judge Robert W. Gettleman
Magistrate Judge Arlander Keys

COMPLAINT

Plaintiff, **GERMAINE J GRANT**, hereby sues Defendant, **CLIENT SERVICES INC.**;
and alleges:

PRELIMINARY STATEMENT

1. This is an action for damages brought for damages for damages for violations of the Fair Credit Reporting Act (FCRA) 15 U.S.C. §1681 *et seq.*

JURISDICTION AND VENUE

2. The jurisdiction of this Court is conferred by 15 U.S.C. §1681p.
3. Venue is proper in this Circuit pursuant to 28 U.S.C. §1391b.
4. This is an action for damages which do not exceed \$5,000.00.
5. Plaintiff, **GERMAINE J GRANT**, is a natural person and is a resident of the State of Illinois.
6. Defendant, **CLIENT SERVICES INC**, is a Missouri Corporation, authorized to do business in Illinois.
7. All conditions precedent to the bringing of this action have been performed, waived or excused.

FACTUAL ALLEGATIONS

8. On November 3, 2010, **CLIENT SERVICES INC** initiated a hard pull of Plaintiff's credit report from Experian without permissible purpose, thereby reducing his credit score.

FILED
8/1/2011
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9. Twice on November 3, 2010, and on November 5th, 2010 CLIENT SERVICES INC initiated a soft pull of Plaintiff's credit report from Experian without permissible purpose.

COUNT I
VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681
WILLFUL NON-COMPLIANCE BY DEFENDANT CLIENT SERVICES INC

10. Paragraphs 1 through 9 are realleged as though fully set forth herein.

11. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).

12. CLIENT SERVICES INC is a furnisher of information within the meaning of the FCRA, 15 U.S.C. §1681s-2.

13. CLIENT SERVICES INC willfully violated the FCRA. Defendant's violations include, but are not limited to, the following:

(a) CLIENT SERVICES INC willfully violated 15 U.S.C. §1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages against CLIENT SERVICES INC for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to 15 U.S.C. §1681n.

COUNT II
VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681
NEGLIGENT NON-COMPLIANCE BY DEFENDANT CLIENT SERVICES INC

14. Paragraphs 1 through 9 are realleged as though fully set forth herein.

15. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).

16. CLIENT SERVICES INC is a furnisher of information within the meaning of the FCRA, 15 U.S.C. §1681s-2.

17. CLIENT SERVICES INC negligently violated the FCRA. Defendant's violations include, but are not limited to, the following:

(a) CLIENT SERVICES INC negligently violated 15 U.S.C. §1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages against CLIENT SERVICES INC for actual damages, and attorney's fees and costs, pursuant to 15 U.S.C. §1681o.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury of all issues so triable as a matter of law.

Dated: July 27, 2011

Respectfully submitted,

Gm Grant

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